

EXHIBIT A

From: Bret Stanley
To: Gromada, Veronica G. (SHB); Beth Wilkins; Roopal Luhana; Shortnacy, Michael (SHB); Oot, Patrick L. (SHB); Haider, Jay B. (SHB); Schoultz, Shannon M. (SHB); 'Wolf, Marc Price'; Wikler, Jeremy (SHB); Marlene Goldenberg
Cc: Rachel Abrams; Sarah London; Uber MDL Discovery Team; Michael Sweet
Subject: RE: Uber MDL M&C re: Discovery Schedule and Custodians
Date: Tuesday, June 4, 2024 7:39:00 AM
Attachments: [image003.png](#)
[image004.png](#)
[image006.png](#)
[image007.png](#)

Thank you, Veronica. However, all of these policies are relevant at least to the Employment Question and Uber's control / right to control the Drivers. All of these policies impact how Uber manages these drivers through its system and support staff.

The [REDACTED] policies should be produced.

From: Gromada, Veronica G. (SHB) <vgromada@shb.com>
Sent: Friday, May 31, 2024 8:38 PM
To: Bret Stanley <BStanley@johnsonlawgroup.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Schoultz, Shannon M. (SHB) <sschoultz@shb.com>; 'Wolf, Marc Price' <mpricewolf@paulweiss.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberg.com>
Cc: Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@lchb.com>; Uber MDL Discovery Team <ubermdldiscovery@chaffinluhana.com>; Michael Sweet <sweet@chaffinluhana.com>
Subject: RE: Uber MDL M&C re: Discovery Schedule and Custodians

[EXTERNAL]

Good evening, Bret.

We are reviewing your list and comparing it to the log of policies included in JCCP and MDL productions. This includes a review of the discovery requests and identifying policies that are responsive. For example, some of the policies on the list provided relate to car seats, animals, parking fees, tolls, and other topics with no apparent relevance to the litigation.

We will continue to reconcile the lists as we prepare for productions.

Veronica G. Gromada
Partner
vgromada@shb.com | (713)930-8851

From: Bret Stanley <BStanley@johnsonlawgroup.com>
Sent: Wednesday, May 29, 2024 6:23 PM
To: Beth Wilkins <Wilkins@chaffinluhana.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Schoultz, Shannon M. (SHB) <sschoultz@shb.com>; 'Wolf, Marc Price' <mpricewolf@paulweiss.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberg.com>
Cc: Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@lchb.com>; Uber MDL Discovery Team <ubermdldiscovery@chaffinluhana.com>; Michael Sweet <sweet@chaffinluhana.com>
Subject: RE: Uber MDL M&C re: Discovery Schedule and Custodians

EXTERNAL

Counsel –

Do you intend to produce a Knowledge Base [REDACTED] Policies requested in the May 17, 2024 email below?

From: Bret Stanley

Sent: Friday, May 17, 2024 10:50 AM

To: Beth Wilkins <Wilkins@chaffinluhana.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Schoultz, Shannon M. (SHB) <sschoultz@shb.com>; 'Wolf, Marc Price' <mpricewolf@paulweiss.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>

Cc: Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@lchb.com>; Uber MDL Discovery Team <ubermddiscovery@chaffinluhana.com>; Michael Sweet <sweet@chaffinluhana.com>

Subject: RE: Uber MDL M&C re: Discovery Schedule and Custodians

Veronica, Michael, and Jeremy –

Following up on the items listed by Beth below, we also discussed the production of Uber Policies on the call yesterday. Please excuse this longwinded email, but I think it will help you to know the back story.

As discussed on our May 16, 2024 call, I have litigated wage and hour cases against Uber for many years, both trying many cases through final arbitration hearings and trying the *Razak vs Uber* matter in March 2024 before Judge Baylson (Eastern District of PA – Philadelphia). Discovery efforts in these matters have resulted in the production of many policies from Uber's Knowledge Base ("KB") Platform and many other types of documents. I have hours of testimony from Brad Rosenthal and Matthew Baker on these Policies and other matters. Matthew Baker is Uber's main testifier Uber's KB Platform Policies. You should ask your client for a copy of the 30b6 Deposition I took of Matthew Baker on January 18, 2023 in the *Saxton & Taboada vs Uber Technologies* matter in Austin, Texas. [REDACTED]

[REDACTED] I cannot share this deposition with you due to protective order. However, KB Policies provide a roadmap for Uber Support Staff to follow when dealing with any type of support request from a User of Uber's system. [REDACTED]

Having received and reviewed many of these policies, it is very clear to me that an index **does exist** on the KB Platform. Indeed, all of the Policies have an [REDACTED] that look something like this:

The above link is for the [REDACTED]. The Article Record type is [REDACTED]" and this version's Publication Status is listed as [REDACTED]" because later versions of this Policy have been published since this version was produced to me.

My assumption is you will find an Index at the following hyperlink: [REDACTED]

You also might find helpful the trial testimony from the *Razak* trial of Tara Murray, taken by Shannon Liss-Riordan, and Chad Dobbs taken by me. Both of these witnesses give testimony about Uber's system and information of the KB Platform. I can share this testimony with you if you need it because it came in open court and is not sealed.

As discussed, each of these KB Platform Policies reference other Policies in the [REDACTED]" section. I have pulled the names of all the KB Platform Policies that have been produced to me as well as the names of all KB Platform Policies that are listed in the "[REDACTED]" section of these Policies. **Attached** is a spreadsheet with the names of all Policies that I'm aware of. If the policy is highlighted in red, then it is duplicated on my list due to multiple versions of the same policy.

To be sure, more policies exist than what I have listed on my spreadsheet. **This is not the total universe.** However, to my knowledge Uber has not produced these documents to any other lawyer.

Pursuant to the ESI order and the agreed-upon discovery milestones, Uber was to provide Plaintiffs with a list of non-custodial files that could be produced without the use of search terms by April 26. Although Uber provided a list on May 6, the list was comprised primarily of incident-specific documents that Uber is required to produce pursuant to the Defendant Fact Sheet. During the meet and confer on May 10, we inquired about the production of non-custodial policy and procedure files or an [REDACTED]. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Please review the material attached and review the [REDACTED]. Once reviewed, please produce the Policies listed on my spreadsheet, the [REDACTED], and all other policies referenced in the portal immediately.

Our position is that these documents should have been produced already.

Sincerely,

From: Beth Wilkins <Wilkins@chaffinluhana.com>

Sent: Thursday, May 16, 2024 8:02 PM

To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Schoultz, Shannon M. (SHB) <sschoultz@shb.com>; 'Wolf, Marc Price' <mpricewolf@paulweiss.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>

Cc: Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@lchb.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Michael Sweet <sweet@chaffinluhana.com>

Subject: RE: Uber MDL M&C re: Discovery Schedule and Custodians

[EXTERNAL]

Counsel,

In follow-up to our call today, we can expect to receive the following from you in sufficient time to meaningfully review before our next call on Monday at 6:30 pm ET:

1. An update as to whether you have been able to identify any organizational charts (beyond the Rosenthal deposition) that can be produced without the use of search terms;
2. Uber's rationale for selecting each custodian in Uber's list of 29 custodians, as required by the ESI Protocol (Plaintiffs will endeavor to do the same and expect to provide this information mid or late next week);
3. An explanation of the basis for the following objections to RFPs that you have stated you intend to make:
 - a. Requests for documents outside the possession of Uber, or equally available to Plaintiffs (Requests 1, 44, 173) [REDACTED]
[REDACTED] s.

- b. Requests for documents relating to Uber's payments regarding lobbying efforts, support for certain organizations or activities (Requests 108, 111, 114, 116): [REDACTED]
[REDACTED]

- c. Requests for documents related to Uber campaigns or business initiatives or any activities unrelated to sexual misconduct or sexual assault in connection with trips requested using the Uber app in the US (Requests 40, 98, 99, 103, 104, 107, 162, 163): [REDACTED]
[REDACTED]

- d. Requests for documents implicating the privacy rights of non-parties (Requests 41, 42, 59, 60, 61, 62, 63, 74, 75): [REDACTED]
[REDACTED]

[REDACTED]

e. Although not addressed during our call today, we ask that you also provide on or before Monday, your basis for objecting to production of any documents prior to 2014. The allegations in Plaintiffs' complaint involve actions and decisions that date back to 2009 and it is our position that the date range at issue is 2009 to present.

Additionally, you indicated during our call that the custodial files for Catherine Gibbons and Lordes McLoughlin are still in the process of being collected and you could not provide a date by which you expect to be in a position to provide hit reports for these custodians. We hope that you will be able to provide an update on Monday, including a date that these hit reports can be expected.

Under separate cover, we will be in contact regarding the search terms issues and knowledge repository matters discussed during our call today.

Thank you,
Beth

Beth Wilkins, J.D., M.P.H.



CHAFFIN LUHANA LLP

Cell: [\(314\) 856-5440](tel:3148565440)

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Friday, May 10, 2024 7:54 PM

To: Beth Wilkins <Wilkins@chaffinluhana.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Schoultz, Shannon M. (SHB) <sschoultz@shb.com>; 'Wolf, Marc Price' <mpricewolf@paulweiss.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberg.com>

Cc: Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@lchb.com>; Uber MDL Discovery Team <ubermldiscovery@chaffinluhana.com>; Michael Sweet <sweet@chaffinluhana.com>

Subject: Uber MDL M&C re: Discovery Schedule and Custodians

Counsel,

In response to the questions you raised in our May 7, 2024 meet and confer and memorialized in your May 7, 2024 email, Uber is providing the following requested information.

- A. **Provide Uber's Search Terms.**
- B. **Provide hit reports for searches Uber has run to date, including the terms used and the custodial or non-custodial sources searched.**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

-
- | Category | Percentage |
|----------|------------|
| • | ~55% |
| | ~100% |
| | ~65% |
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| | ~65% |
| | ~80% |
| | ~45% |
| | ~85% |
| | ~60% |

_____.

- F. Identify the process that Uber proposes for producing the documents previously produced in the JCCP (under point (3) of Ms. Gromada's email), provide a date certain that Uber will produce those documents here, and confirm that the production will be in compliance with the ESI order in place here, including all metadata fields.

[REDACTED]

- G. Provide its position on producing non-custodial files related to its collection, aggregation, categorization and analysis of sexual misconduct reports including the data underlying Uber's Safety Reports as well as the data for the remaining 16 categories of sexual misconduct that was not included in the Safety Reports, as well data and files that have been created or collected following the Safety Reports. This will include whether Uber will produce here the files that it has been ordered to produce in the JCCP.

[REDACTED]

- H. Provide its position on producing non-custodial policy and procedure files or an index of policies and procedures, including for retaining email and other communications on other platforms such as slack and G chat.

[REDACTED]

- I. Confirm that when Uber applies search terms to custodial files, the entire mailbox plus all attachments and hyperlinked documents will be pulled and searched and if either the email or attachment/hyperlinked document hits on a search term, but the email and attachment/hyperlinked document will be produced.

[REDACTED]

Veronica G. Gromada
Partner
Shook, Hardy & Bacon L.L.P.

713-546-5683 | vgromada@shb.com



From: Beth Wilkins <Wilkins@chaffinluhana.com>

Sent: Tuesday, May 7, 2024 4:53 PM

To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Schoultz, Shannon M. (SHB) <sschoultz@shb.com>; 'Wolf, Marc Price' <mpricewolf@paulweiss.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>

Cc: Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@lchb.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Michael Sweet <sweet@chaffinluhana.com>

Subject: RE: Uber MDL M&C re: Discovery Schedule and Custodians,

EXTERNAL

Counsel,

In follow up to our call this afternoon, we'd like to memorialize the following items that were discussed:

1. By the end of this week, Uber will:
 - a. Provide Uber's search terms, or if not, a date certain by which Uber will provide its search terms.
 - b. Provide hit reports for searches Uber has run to date, including the terms used and the custodial or non-custodial sources searched.
 - c. Identify by Request number the RFPs that Uber objects to for each category of objection under point (1) of Ms. Gromada's May 6 email.
 - d. Identify the basis for Uber's objections to the RFPs indicated under point (2) of Ms. Gromada's May 6 email.
 - e. Identify the discovery request in the JCCP litigation corresponding to each MDL RFP indicated under point (3) of Ms. Gromada's May 6 email.
 - f. Identify the process that Uber proposes for producing the documents previously produced in the JCCP (under point (3) of Ms. Gromada's email), provide a date certain that Uber will produce those documents here, and confirm that the production will be in compliance with the ESI order in place here, including all metadata fields.
 - g. Provide its position on producing non-custodial files related to its collection, aggregation, categorization and analysis of sexual misconduct reports including the data underlying Uber's Safety Reports as well as the data for the remaining 16 categories of sexual misconduct that was not included in the Safety Reports, as well data and files that have been created or collected following the Safety Reports. This will include whether Uber will produce here the files that it has been ordered to produce in the JCCP.
 - h. Provide its position on producing non-custodial policy and procedure files or an index of policies and procedures, including for retaining email and other communications on other platforms such as slack and G chat.
 - i. Confirm that when Uber applies search terms to custodial files, the entire mailbox plus all attachments and hyperlinked documents will be pulled and searched and if either the email or attachment/hyperlinked document hits on a search term, but the email and attachment/hyperlinked document will be produced.
2. The parties will hold a final meet and confer regarding custodians, non-custodial sources, and search terms on May 20. If we have not reached an agreement on each of these topics by May 27, plaintiffs will initiate the PTO 8 process so that this issue will be before Judge Cisneros by June 6.
3. Uber will serve final objections and responses to plaintiffs' First Interrogatories and First Requests for Admission by June 20.
4. By June 29, Uber will have produced the majority of non-custodial files indicated under point (4) of Ms. Gromada's May 6 email. The only documents under point (4) that may not yet be produced by that date are documents responsive to later-filed cases in which the DFS would not be due before June 29.
5. We will meet and confer about these issues as well as custodians and the discovery schedule in general on May 10 at 12 ET/11 CT/9 PT.

Beth Wilkins, J.D., M.P.H.



CHAFFIN LUHANA LLP

Cell: [\(314\) 856-5440](tel:3148565440)

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Monday, May 6, 2024 9:28 PM

To: Beth Wilkins <Wilkins@chaffinluhana.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Schoultz, Shannon M. (SHB) <sschoultz@shb.com>; 'Wolf, Marc Price' <mpricewolf@paulweiss.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>

Cc: Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@lchb.com>; Uber MDL Discovery Team <ubermdldiscovery@chaffinluhana.com>; Michael Sweet <sweet@chaffinluhana.com>

Subject: Uber MDL M&C re: Discovery Schedule and Custodians,

EXHIBIT B

From: [Bret Stanley](#)
To: [Gromada, Veronica G. \(SHB\)](#); [Michael Sweet](#); [Shortnacy, Michael \(SHB\)](#)
Cc: [Beth Wilkins](#); [Sarah London](#); [Rachel Abrams](#); [Uber MDL Discovery Team](#); [Haider, Jay B. \(SHB\)](#); [Roopal Luhana](#)
Subject: RE: NCDS, Knowledge [REDACTED]
Date: Tuesday, July 23, 2024 10:19:00 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Veronica –

I believe that Uber sharing these materials with SHB is technically a violation of the Protective Order in those matters and we are in a “good for goose / good for gander” situation. That said, I am glad Uber shared these materials with you because they are additive to our discussions and insure that SHB has visibility to the documents that exist.

I will hold the deposition and materials for now. However, our position is that Uber should have already produced the underlying KB Policies that were discovered in my prior Employment Arbitrations.

Once we receive the [REDACTED], we will set a meeting to discuss the production of KB Policies and a timeline for production of these materials. Hopefully there will be no need to take the issue of production of these materials up with the Court because they will be produced quickly.

Sincerely,

From: Gromada, Veronica G. (SHB) <vgromada@shb.com>
Sent: Monday, July 22, 2024 11:03 AM
To: Bret Stanley <BStanley@johnsonlawgroup.com>; Michael Sweet <sweet@chaffinluhana.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabel@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Roopal Luhana <Luhana@chaffinluhana.com>
Subject: RE: NCDS, Knowledge Base Homepages, and Policies

[EXTERNAL]

Good morning, Bret.

Thank you for your email. We met with the client on Friday and are speaking with them again today. We will tee up the topics and requested approach in your email below at that time.

In the interim, please do not share the Baker Deposition, which is Uber’s confidential information with your team.

We will circle back.

Veronica G. Gromada
Partner
vgromada@shb.com | (713)930-8851

From: Bret Stanley <BStanley@johnsonlawgroup.com>
Sent: Monday, July 22, 2024 10:15 AM
To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Michael Sweet <sweet@chaffinluhana.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabel@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Roopal Luhana <Luhana@chaffinluhana.com>

Subject: RE: NCDS, Knowledge Base Homepages, and Policies

EXTERNAL

Veronica and Uber Team –

Sorry for missing your call on Friday, I was OOO picking up my daughter from camp on Friday and had very little connectivity.

Please let me know when your team can meet and confer on production of the KB Homepages and Non-Custodial Sources referenced below.

Do we want to add it to the M&C already scheduled at 11CT/12ET tomorrow? If we need more time, we are available during these windows:

- Tuesday: 11:00am ET - 12:00pm ET; 3:00pm ET – after hours
- Wednesday: 10:00am ET - 1:00pm ET; 3:00pm ET – after hours

Regarding production of the [REDACTED] and Policies, they should be produced in a format that they were produced in my *Saxton* case. Uber has given you access to that deposition and exhibits. [REDACTED]

Finally, I intend to share the Baker Depo with my team, since Uber has shared the Baker Depo with you all.

Non-Custodial List

We are reviewing your Non-Custodial List. Below I notice that [REDACTED] is not listed. My assumption is Uber is not characterizing [REDACTED] as a Non-Custodial Source because Uber considers this a system not a Non-Custodial Source. However, it's my understanding that [REDACTED] is the [REDACTED] that houses data on both Riders and Drivers. The system is [REDACTED] by name or UUID for Riders and Drivers.

Next, can you go back to your client about [REDACTED]? According to what I see in the documents [REDACTED] is a non-custodial source that can be queried and produces information about Drivers and possibly Riders. Documents indicate Uber had a [REDACTED] that assisted with queries and [REDACTED] user interactions.

Finally, it is Plaintiffs' understanding that Uber should have provided a date certain for production for its non-custodial sources. At this time, we do not believe we've received that date and are concerned when rolling productions will begin. Plaintiffs believe this should have begun already. Please provide Uber's position.

Please let me know if you have any questions concerning these items.

Sincerely,

Bret Stanley | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098

Toll Free (800) 230-7700 | Phone (713) 626-9336 | Fax (713) 583-9460

BStanley@johnsonlawgroup.com | www.johnsonlawgroup.com

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Friday, July 19, 2024 7:08 PM

To: Bret Stanley <BStanley@johnsonlawgroup.com>; Michael Sweet <sweet@chaffinluhana.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabels@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Roopal Luhana <Luhana@chaffinluhana.com>

Subject: NCDS, Knowledge Base Homepages, and Policies

[EXTERNAL]

Good evening, Bret/Counsel.

Bret, I called so we could discuss the court's order concerning policies and knowledge base homepages. We are continuing to investigate [REDACTED]. As discussed, these [REDACTED]
[REDACTED]
[REDACTED] So, as stated in the voicemail, please let me know if you are available this weekend or Monday/early next week.

Meanwhile, below are further insights into Uber's non-custodial data sources. Note the list includes some additional context for the NCDS. [REDACTED]
[REDACTED]

Again, happy to connect this weekend or Monday.

[REDACTED]

[REDACTED]

- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]

- [REDACTED]
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[REDACTED]

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 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
- [REDACTED]
 - [REDACTED]

-
- The diagram illustrates a hierarchical structure composed of numerous black rectangular blocks of varying sizes. These blocks are interconnected by thin black lines, forming a complex network. The structure is organized into several distinct groups or clusters, each with its own internal hierarchy. The blocks are arranged in a way that suggests a flow or relationship between them, with some blocks acting as parents to multiple child blocks. The overall layout is dense and intricate, with many branches and sub-branches. The blocks are primarily black, with some small blue dots and squares scattered throughout, possibly indicating specific nodes or connections within the hierarchy.

Partner

713-546-5683 | vgromada@shb.com



From: Bret Stanley <BStanley@johnsonlawgroup.com>

Sent: Thursday, July 18, 2024 9:00 AM

To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Michael Sweet <sweet@chaffinluhana.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabrams@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Roopal Luhana <Luhana@chaffinluhana.com>

Subject: RE: Knowledge Base Policy / Index

EXTERNAL

Veronica, are you all considering Knowledge Base as a non-custodial source?

Bret Stanley | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098

Toll Free (800) 230-7700 | Phone (713) 626-9336 | Fax (713) 583-9460

BStanley@johnsonlawgroup.com | www.johnsonlawgroup.com

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Wednesday, July 17, 2024 6:28 PM

To: Bret Stanley <BStanley@johnsonlawgroup.com>; Michael Sweet <sweet@chaffinluhana.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabrams@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Roopal Luhana <Luhana@chaffinluhana.com>

Subject: RE: Knowledge Base Policy / Index

[EXTERNAL]

Thank you, Bret. We'll circle back on these.

Veronica G. Gromada

Partner

vgromada@shb.com | (713)930-8851

From: Bret Stanley <BStanley@johnsonlawgroup.com>

Sent: Wednesday, July 17, 2024 4:11 PM

To: Michael Sweet <sweet@chaffinluhana.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>

Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabrams@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Roopal Luhana <Luhana@chaffinluhana.com>

Subject: RE: Knowledge Base Policy / Index

EXTERNAL

Michael, Veronica, and Jay –

As a reminder, the four [REDACTED] I identified on the call were:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

This is not the universe of [REDACTED]. I [REDACTED], but possibly more.

Thanks,

Bret Stanley | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098
Toll Free (800) 230-7700 | Phone (713) 626-9336 | Fax (713) 583-9460
BStanley@johnsonlawgroup.com | www.johnsonlawgroup.com

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From: Michael Sweet <sweet@chaffinluhana.com>

Sent: Wednesday, July 17, 2024 2:10 PM

To: Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Bret Stanley <BStanley@johnsonlawgroup.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>

Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabrams@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Roopal Luhana <Luhana@chaffinluhana.com>

Subject: Re: Knowledge Base Policy / Index

[EXTERNAL]

Michael, Veronica and Jay,

Thank you for taking the time to meet today to discuss Knowledge Base and other non-custodial source discovery issues. We are glad that you believed it to be productive and look forward to hearing from you this Friday. It is our understanding that you intend to produce and/or update us on Friday as to Uber producing: (1) [REDACTED]; and (2) a full single list of sources Uber uses that you have compiled.

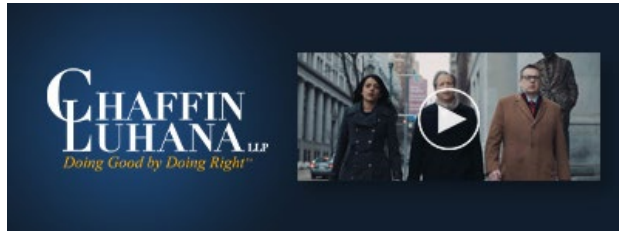
Thank you!

Michael Sweet | Associate

E: sweet@chaffinluhana.com

P: (412) 752-7518

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Mailing Address:

Chaffin Luhana LLP 615 Iron City Drive, Pittsburgh, PA, 15205

A referral is the best compliment. If you know anyone who needs our help, please have them call us. We're available 24/7.

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From: Michael Sweet <sweet@chaffinluhana.com>

Sent: Tuesday, July 16, 2024 5:09 PM

To: Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>
Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabel@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Roopal Luhana <Luhana@chaffinluhana.com>
Subject: Re: Knowledge Base Policy / Index

Michael,

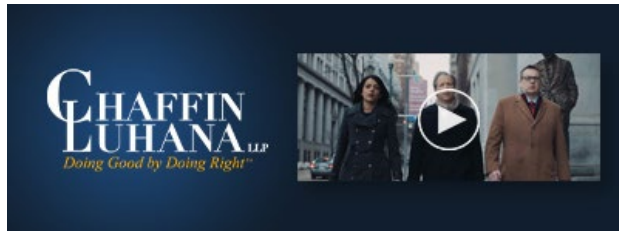
Looking forward to meeting tomorrow. Generally, to the best of our knowledge Uber has not produced a full and complete list of non-custodial sources and what exactly they will be producing from it. We are seeking clarification to Uber's May 6 and June 21 emails regarding this topic, the list, what we can expect, and when we can expect it. We are still unsure of what Uber will be producing outside of the DFS without search terms. Separately we would like to know more about: [REDACTED]

To the extent you can provide anything before the meeting, that would be helpful. For example, on June 21, [REDACTED].

Michael

Michael Sweet | Associate
E: sweet@chaffinluhana.com
P: (412) 752-7518

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From: Shortnacy, Michael (SHB) <mshortnacy@shb.com>
Sent: Tuesday, July 16, 2024 9:53 AM
To: Bret Stanley <bstanley@johnsonlawgroup.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>
Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Michael Sweet <sweet@chaffinluhana.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabel@peifferwolf.com>; Uber MDL Discovery Team <ubermlddiscovery@chaffinluhana.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Roopal Luhana <Luhana@chaffinluhana.com>
Subject: RE: Knowledge Base Policy / Index

Bret – let's do Wednesday morning PT, at say 9 am ? Michael

From: Bret Stanley <BStanley@johnsonlawgroup.com>

Sent: Monday, July 15, 2024 8:06 AM

To: Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Gromada, Veronica G. (SHB) <ygromada@shb.com>

Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Michael Sweet <sweet@chaffinluhana.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabel@peifferwolf.com>; Uber MDL Discovery Team <ubermddiscovery@chaffinluhana.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; luhana@chaffinluhana.com

Subject: Knowledge Base Policy / Index

EXTERNAL

Michael and Veronica –

Are you available to discuss the production of the [REDACTED] and production of KB Policies?

I am available Tuesday (7/16) from 9CT-12:30CT and 2-5(CT) and completely flexible on Wednesday (7/17) to meet at any time.

We intend to discuss this with Judge Cisneros at this week's status conference. Please let me know when you can meet on the issue.

Sincerely,

Bret Stanley | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098
Toll Free (800) 230-7700 | Phone (713) 626-9336 | Fax (713) 583-9460
BStanley@johnsonlawgroup.com | www.johnsonlawgroup.com

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From: Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Sent: Wednesday, June 19, 2024 3:26 PM

To: Roopal Luhana <Luhana@chaffinluhana.com>

Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Michael Sweet <sweet@chaffinluhana.com>; Sarah London <slondon@lchb.com>; Rachel Abrams <rabel@peifferwolf.com>; Uber MDL Discovery Team <ubermddiscovery@chaffinluhana.com>; Gromada, Veronica G. (SHB) <ygromada@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>

Subject: RE: Call

[EXTERNAL]

Roopal – thank you for flagging that; looks like a print to PDF issue. We re-scaled the PDF and this should work now. Michael

Michael B. Shortnacy

Partner

Shook, Hardy & Bacon L.L.P.

2121 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067

T: 424-324-3494 | mshortnacy@shb.com

***Please note new mailing address**



From: Roopal Luhana <Luhana@chaffinluhana.com>

Sent: Wednesday, June 19, 2024 1:16 PM

To: Shortnacy, Michael (SHB) <mshortnacy@shb.com>

Cc: Beth Wilkins <Wilkins@chaffinluhana.com>; Michael Sweet <sweet@chaffinluhana.com>; Sarah London <slondon@lchb.com>;

EXHIBIT C



Ms. Veronica Gromada
Shook Hardy & Bacon
600 Travis St., Suite 3400
Houston, Texas 77002

June 2, 2025

RE: Response to Uber's Claims of Violations of Protective Order,
In re: Uber Technologies, Inc. Passenger Sexual Assault Litigation,
Case No. 2:23-md-03084-CRB

Ms. Gromada –

I am in receipt of your letter dated May 26, 2025 in which you allege that I have violated the Protective Order of MDL 3084 by serving written document requests in other litigations requesting relevant and discoverable information from Uber Technologies, Inc.

The Protective Order of MDL 3084 was entered on December 28, 2023. (*See* ECF 176). At no point have I violated the Protective Order of MDL 3084 and no disclosures of Protected Material have been made to any category of persons outside of the scope of the Protective Order.

As you are aware, the Protective Order in this matter does not confer blanket protections on all disclosures or responses to discovery and the Protective Order extends protections only to limited information or items that are entitled to confidential treatment under applicable legal principles. *See* ECF 176 at Para. 1. The Protective Order defines Confidential Information as material that contains “financial or business plans or projections; proprietary business information, or other confidential research, design, development, financial, business or commercial information; information regarding or relating to a Party’s insurance program; personnel information; personal information about any Party to this lawsuit or employees (current or former) or board members (current or former) of any Party to this lawsuit; the personal information and any identifying information of any Non-Party; non-public incidents reports; executive committee selection; and any information regarding any Party or Non-Party not otherwise available to the public that is protected from disclosure by law, regulation, or contract.” *See* ECF 176 at Para. 2.3.

The Protective Order in MDL 3084 cautions parties to exercise restraint and care in designating material for protection. *See* ECF 176 at Para. 5.1. The Order requires each Party or Non-Party to take care to limit confidentiality designations “so that other materials, documents, items, or communications for which protection is not warranted are not swept unjustifiably within the ambit of [the] Order.” *See* ECF 176 at Para. 5.1. The Order prohibits “[m]ass, indiscriminate, or routinized designations” and unjustified confidentiality designations “may expose the Designating Party to sanctions.” *Id.*

Uber complains that using the *names* of Uber policies in written discovery requests made outside of MDL 3084 breaches the Protective Order. However, no information from any policy document has been copied or extracted and no copies, excerpts, summaries, or compilations of any Uber Policy has been made or disclosed to persons not bound by the Protective Order.

Uber is required by the Protective Order to make “all reasonable efforts” to designate for protection only those parts of documents that qualify as confidential. See ECF 176 at Para 5.1 (emphasis added). Uber’s claim that using the *name* alone of a policy in written discovery violates the Protective Order is an attempt to unjustifiably sweep information into the ambit of the Protective Order and is a mass, indiscriminate, and routinized designation of confidentiality that is prohibited by the Protective Order in MDL 3084.

Finally, as Judge Cisneros has addressed in the past concerning the *Peters Subpoena* and the *Stanley Subpoena* served on Sara Peters and Bret Stanley in MDL 3084, counsel with experience litigating against Uber cannot unknow relevant and discoverable information that has been produced while litigating claims against Uber. Serving focused discovery requests that seek relevant and discoverable information against Uber in other litigations does not violate any protective order, including the Protective Order from MDL 3084.

To the extent this letter does not address your concerns, I am available to meet and confer at a time of mutual availability.

Sincerely,



Bret Stanley

Johnson Law Group

MDL 3084 Plaintiff Steering Committee

EXHIBIT D



Sent from: New York Office

June 4, 2025

Sent via Email

Veronica Hayes Gromada, Esq.
Shook, Hardy, & Bacon, L.L.P.
600 Travis St., Suite 3400
Houston, Texas 77002
vgromada@shb.com

**Re: *In re: Uber Passenger Sexual Assault 23-md-03084-CRB*
Response to Uber's Claims of Violations of Protective Order**

Counsel:

I write on behalf of the Plaintiffs' Steering Committee (PSC) in response to your correspondence dated May 26, 2025, in which you allege that PSC member Bret Stanley violated the Protective Order entered in this litigation (ECF No. 176) by serving document requests in unrelated actions that reference certain Uber Technologies, Inc. policies.

To be clear, neither Mr. Stanley nor any member of the PSC has violated the Protective Order. To our knowledge, no confidential material produced in this MDL has been disclosed outside this litigation, nor has any information designated under the Protective Order been shared with persons not bound by its terms.

As you know, the Protective Order does not impose blanket protection over all discovery but rather narrowly protects specific categories of information as defined in Paragraph 2.3. Uber's assertion that the mere reference to the names of Uber's internal policies constitutes a breach lacks merit and stretches the Order beyond its intended scope. Courts have consistently held that attorneys may use general knowledge and experience gained in one matter in subsequent litigation, provided that confidential materials themselves are not disclosed. *See, e.g., In re Dual-Deck Video Cassette Recorder Antitrust Litig.*, 10 F.3d 693, 695 (9th Cir. 1993)(finding no violation of protective order when using knowledge of confidential information in a subsequent matter against the same party: "lawyers cannot achieve total amnesia", those "who learn from and use their experience obtained in discovery under such an order would have to change fields, and never do [] work again, lest they 'use' what they learned in a prior case 'in any way whatsoever' in any 'other action.'" For the protective order to comply with common sense, a reasonable reading must connect

its prohibitions to its purpose [].""); *see also Streck, Inc. v. Rsch. & Diagnostic Sys., Inc.*, 250 F.R.D. 426, 435 (D. Neb. 2008) (finding no violation of order because a "general reference to protected documents [in subsequent] proceedings [was] insufficient"); *Hu-Friedy Mfg. Co. v. Gen. Elec. Co.*, 1999 WL 528545, at *3 (N.D. Ill. July 19, 1999) (declining to interpret order "barring future use of confidential information that is independently relevant and discoverable in a subsequent action into a restriction on an attorney's right to practice law").

We categorically reject any suggestion that protected materials have been improperly used to support other litigation, nor that the PSC sought discovery in this matter simply so that Mr. Stanley could seek such discovery in other matters, as Uber erroneously suggests. That said, we do not intend to detail or disclose the full scope of steps the PSC has taken—or will take—internally to ensure continued compliance with the Protective Order. Such internal measures are part of the PSC's deliberative processes and are not subject to disclosure to Uber or its counsel. However, the PSC remains fully committed to adhering to all obligations under the Order and takes any allegation of noncompliance seriously.

Should you wish to further discuss this matter, we are available to meet and confer at a mutually convenient time.

Sincerely,



Roopal P. Luhana

cc: Sarah London, Esq.
Rachel Abrams, Esq.
PSC members

EXHIBIT E

From: Bret Stanley
To: Gromada, Veronica G. (SHB); Steven Cohn; Oot, Patrick L. (SHB); Shortnacy, Michael (SHB); Wikler, Jeremy (SHB); Priest Johnson, Kimberly (SHB); Cotton, Chris (SHB); Haider, Jay B. (SHB)
Cc: Roopal Luhana; Rachel Abrams; Sarah London; Andrew Kaufman; Meredith Stratigopoulos; Sara Peters; Marlene Goldenberg; Ellyn Hurd; Khaldoun Baghdadi; Alexandra Walsh; Brian Abramson; Beth Wilkins; Kirk, Brittany E. (SHB)
Subject: Re: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence
Date: Thursday, July 17, 2025 5:45:39 PM
Attachments: [image001.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Thanks, Veronica.

I'll get with our team. I'm available tomorrow before noon CT. Do you have a window in the morning?

Get [Outlook for iOS](#)

From: Gromada, Veronica G. (SHB) <vgromada@shb.com>
Sent: Thursday, July 17, 2025 5:41:25 PM
To: Bret Stanley <bstanley@johnsonlawgroup.com>; Steven Cohn <cohn@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Cotton, Chris (SHB) <CCOTTON@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdruckker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>
Subject: RE: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

[EXTERNAL]

Bret,

We intend to file a motion to enforce the MDL Protective Order tomorrow. Based on additional information we have learned regarding the use of confidential information since our meet and confers, we will also be filing an administrative motion seeking an expedited briefing schedule along with the motion to enforce.

We are flexible any time tomorrow to meet and confer on the briefing schedule as you are available.

From: Bret Stanley <bstanley@johnsonlawgroup.com>
Sent: Friday, July 11, 2025 12:15 PM
To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Steven Cohn <cohn@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Cotton, Chris (SHB) <CCOTTON@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdruckker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>
Subject: RE: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

EXTERNAL

Veronica –

I cannot agree with your proposal. As you know, I have not shared or produced any confidential documents, summaries, or other substantive information from Uber documents with anyone who is not party to the MDL 3084 Protective Order. I have made Requests for Production identifying Knowledge Base Policies and Articles by name in the *Smith* and *Lord* matters. As you recall, I did the exact same thing early in the discovery process of MDL 3084 and supplied your team with names of policies prior to any production from Knowledge Base.

Per your request, I confirm that the only matters I have made requests for production of KB Policies / Articles specifically by name are the *Smith* and *Lord* matters.

Functionally, a requirement that I am to seek permission from Uber before making discovery requests on relevant and discoverable documents is not workable. Likewise, a requirement that I should seek court intervention from the Northern District of California every time I need discovery on relevant and discoverable documents is not workable.

Additionally, your proposal does not work because it assumes that Uber will make productions of Knowledge Base Policies and Articles in connection with general request for production – without asking for the documents by name. Uber refused to make production of these Policies in MDL 3084 until we sought them specifically by name. Likewise, Uber has refused to make these productions in the *Lord* or *Smith* matters in connection with prior more general requests for production.

After a hearing this week in the *Lord* matter, I'm very concerned with the way your team and Uber has characterized the Knowledge Base System to Bowman and Brooke attorneys (who represent Uber in the *Lord* matter). The Bowman and Brooke attorney for Uber made patent misstatements on the record concerning Knowledge Base Policies and Articles. Mischaracterizations and misstatements on the record about these documents are attempts by Uber to withhold them and proves the need for specificity in discovery requests to obtain production.

Finally, Uber is obstructing discovery in the *Smith* matter by refusing to respond to discovery under the guise that I have breached MDL 3084's Protective Order.

These actions need to be brought in front of the Court. Since it is your claim, we need to discuss a filing and response schedule.

Sincerely,



Bret Stanley | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098
Toll Free (800) 230-7700 | Phone (713) 626-9336 | Fax (713) 583-9460
BStanley@johnsonlawgroup.com | www.johnsonlawgroup.com

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Thursday, July 10, 2025 1:23 PM

To: Bret Stanley <bstanley@johnsonlawgroup.com>; Steven Cohn <cohn@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>; Priest Johnson, Kimberly (SHB) <kpi@shb.com>; Cotton, Chris (SHB) <CCOTTON@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenber.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi

<kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>;
Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>
Subject: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

[EXTERNAL]

Bret and Steve,

We are following up regarding our proposal to resolve the Protective Order dispute. Please let us know your position by tomorrow.

Thank you.

From: Gromada, Veronica G. (SHB) <vgromada@shb.com>
Sent: Tuesday, July 8, 2025 3:51 PM
To: Bret Stanley <bstanley@johnsonlawgroup.com>; Steven Cohn <cohn@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>; Priest Johnson, Kimberly (SHB) <kpi@shb.com>; Cotton, Chris (SHB) <CCOTTON@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>
Subject: RE: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

Thank you.

From: Bret Stanley <bstanley@johnsonlawgroup.com>
Sent: Tuesday, July 8, 2025 3:19 PM
To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Steven Cohn <cohn@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>; Priest Johnson, Kimberly (SHB) <kpi@shb.com>; Cotton, Chris (SHB) <CCOTTON@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>
Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>
Subject: RE: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

EXTERNAL

Veronica,

I will discuss this with our team and get back with you.

Sincerely,

Bret Stanley | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098



Toll Free (800) 230-7700 | Phone (713) 626-9336 | Fax (713) 583-9460
BStanley@johnsonlawgroup.com | www.johnsonlawgroup.com

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Tuesday, July 8, 2025 11:33 AM

To: Steven Cohn <cohn@chaffinluhana.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>; Priest Johnson, Kimberly (SHB) <kpi@shb.com>; Cotton, Chris (SHB) <CCOTTON@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>

Subject: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

[EXTERNAL]

Bret and Steve,

Thank you for taking the time to confer last week regarding the Protective Order violation dispute.

Based on the call, we understand your position to be that the names of Uber's policies, Knowledge Bases, or related documents (generally referred to herein as "policies") are not confidential. We understand your position to be that it promotes "efficiency" to use the names of Uber policies identified in the MDL in other cases because you believe Uber is improperly failing to produce those policies in other litigation.

We asked for confirmation that you were not claiming that any particular document produced by Uber in the MDL was improperly designated as Confidential or Highly Confidential – Attorney's Eyes Only. You confirmed that this is not your position.

We then attempted to determine whether you contend that Uber policy names are not confidential even when the policy name was identified by reviewing the content of a Confidential MDL document. As an example, we shared an image of one Confidential MDL document, U [REDACTED]. We asked (twice) whether you agreed that the content of this document was confidential under the Protective Order. You did not answer this question, asked us to take the image down, and indicated that you did not believe it was productive to discuss specific documents. Instead, you reiterated your position that the names of Uber's policies are not confidential and invited Uber to file a motion if it disagreed.

When we ended the call, we agreed to try to identify a compromise that would avoid the need for court intervention and invited you to do the same. Unfortunately, based on your position, we are unable to identify a compromise on the substance of the dispute. Based on our understanding of your position, there appears to be no limiting principle that would prevent MDL plaintiffs' counsel from reviewing millions of pages of confidential MDL production to identify the names of documents they wish to request in other matters.

If we have misstated your position above, please let us know.

While we were not able to identify a compromise on the substance of the dispute, we do have a proposal to "agree to disagree" as follows:

1. You confirm that the only cases in which the names of Uber policies identified in the MDL have been used are the *Smith* and *Lord* cases identified in our letter; and,
2. You agree that before using the names of Uber policies or other information from confidential documents identified in the MDL in any other case, you will seek either Uber's permission or permission from the MDL Court.

Please let us know your position on this proposal or whether you have any other compromise suggestions.

Veronica G. Gromada

Partner

Shook, Hardy & Bacon L.L.P.

713-546-5683 | vgromada@shb.com



From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Monday, June 30, 2025 3:32 PM

To: Bret Stanley <bstanley@johnsonlawgroup.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>; Oot, Patrick L. (SHB) <oot@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <jwikler@shb.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Cotton, Chris (SHB) <ccotton@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>

Subject: Re: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

EXTERNAL

Veronica,

I'll be handling this issue on behalf of the PSC. My understanding was the meet and confer is at 5 EST. If that is correct, can you please forward me the invite. If not, I'm available tomorrow morning to meet and confer on this issue.

Thank you,
Steve

From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Monday, June 30, 2025 4:08 PM

To: Bret Stanley <bstanley@johnsonlawgroup.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>; Oot, Patrick L. (SHB) <oot@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <jwikler@shb.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Cotton, Chris (SHB) <ccotton@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrams@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>

Subject: Re: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

Veronica,

I did not receive the Zoom invitation for the meet and confer on this issue - can you please forward it?

Thank you,
Steve

From: Bret Stanley <bstanley@johnsonlawgroup.com>

Sent: Thursday, June 19, 2025 9:23 AM

To: Steven Cohn <cohn@chaffinluhana.com>; Gromada, Veronica G. (SHB) <vgromada@shb.com>; Oot, Patrick L. (SHB) <oot@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <jwikler@shb.com>; Priest Johnson, Kimberly (SHB) <kpi@shb.com>; Cotton, Chris (SHB) <ccotton@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenber.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>

Subject: RE: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

Veronica – can your team meet tomorrow on this?



Bret Stanley | Senior Counsel

Johnson Law Group | 2925 Richmond Ave., Suite 1700 | Houston, Texas 77098
Toll Free (800) 230-7700 | Phone (713) 626-9336 | Fax (713) 583-9460
BStanley@johnsonlawgroup.com | www.johnsonlawgroup.com

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From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Wednesday, June 18, 2025 11:10 AM

To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Oot, Patrick L. (SHB) <oot@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <jwikler@shb.com>; Priest Johnson, Kimberly (SHB) <kpi@shb.com>; Cotton, Chris (SHB) <ccotton@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Bret Stanley <bstanley@johnsonlawgroup.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenber.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>

Subject: Re: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

[EXTERNAL]

Veronica,

Unfortunately, those times today do not work for us. Does 2pm EST on Friday work? If not, please let us know your availability on Friday.

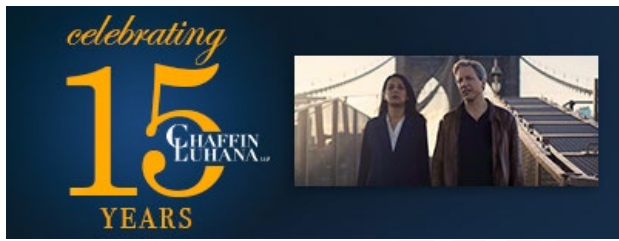
Thanks,
Steve

Steven Cohn | Partner

E: cohn@chaffinluhana.com

P: (347) 269-4465

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ChaffinLuhana.com
ChaffinLuhanaFoundation.org



Mailing Address:

Chaffin Luhana LLP 615 Iron City Drive, Pittsburgh, PA, 15205

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From: Gromada, Veronica G. (SHB) <vgromada@shb.com>

Sent: Tuesday, June 17, 2025 4:55 PM

To: Steven Cohn <cohn@chaffinluhana.com>; Oot, Patrick L. (SHB) <OOT@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <JWIKLER@shb.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Cotton, Chris (SHB) <CCOTTON@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>; Bret Stanley <bstanley@johnsonlawgroup.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Meredith Stratigopoulos <mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberg.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>; Kirk, Brittany E. (SHB) <bkirk@shb.com>

Subject: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

Counsel,

Please advise if Plaintiffs are available for a meet and confer tomorrow between 10am-12pm CT or 4-6pm CT regarding Bret Stanley's Protective Order violations.

Thank you.

From: Steven Cohn <cohn@chaffinluhana.com>

Sent: Wednesday, June 4, 2025 2:24 PM

To: Gromada, Veronica G. (SHB) <vgromada@shb.com>; Oot, Patrick L. (SHB) <oot@shb.com>; Shortnacy, Michael (SHB) <mshortnacy@shb.com>; Wikler, Jeremy (SHB) <jwikler@shb.com>; Priest Johnson, Kimberly (SHB) <kpj@shb.com>; Cotton, Chris (SHB) <ccotton@shb.com>; Haider, Jay B. (SHB) <jhaider@shb.com>

Cc: Roopal Luhana <Luhana@chaffinluhana.com>; Rachel Abrams <rabrabs@peifferwolf.com>; Sarah London <slondon@girardsharp.com>; Andrew Kaufman <akaufman@girardsharp.com>; Bret Stanley <bstanley@johnsonlawgroup.com>; Meredith Stratigopoulos <mdrukker@edelson.com>; Sara Peters <speters@walkuplawoffice.com>; Marlene Goldenberg <mgoldenberg@nighgoldenberg.com>; Ellyn Hurd <ehurd@simmonsfirm.com>; Khaldoun Baghdadi <kbaghdadi@walkuplawoffice.com>; Alexandra Walsh <awalsh@anapolweiss.com>; Brian Abramson <babramson@whlaw.com>; Beth Wilkins <Wilkins@chaffinluhana.com>

Subject: Re: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation MDL 3084 -- correspondence

EXTERNAL

Counsel,

Please see the attached correspondence.

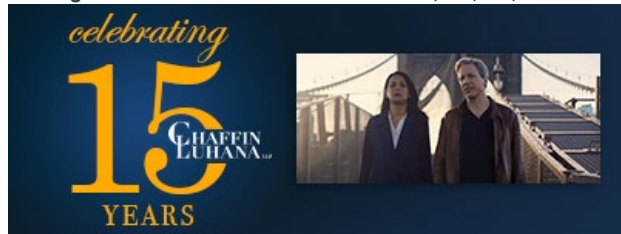
Regards,
Steve

Steven Cohn | Partner

E: cohn@chaffinluhana.com

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